ARCHAEOLOGICAL RESOURCES INVESTIGATIONS

PERMIT POLICY

Archaeological Resource Management
Community Support Services Branch – Heritage
Saskatchewan Municipal Affairs, Culture and Housing

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ABSTRACT

This document sets forth permit requirements for archaeological investigations in the Province of Saskatchewan. Two classes of study are recognized: Archaeological Research and Heritage Resources Impact Assessment and Mitigation. The qualifications expected of applicants and standard operating and reporting procedures are described.

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ARCHAEOLOGICAL RESOURCES INVESTIGATIONS: PERMIT POLICY

INTRODUCTION

In the interest of preserving Saskatchewan's finite and non-renewable heritage resources, the Legislative Assembly passed ***The Heritage Property Act*** (hereafter, the HPA) in 1980.

Section 67 of the HPA requires that a valid and subsisting investigation permit be issued before a survey, surface collection or excavation can be carried out for the purpose of obtaining archaeological or palaeontological objects or information on these objects. The Minister responsible grants such permits and may stipulate any terms and conditions under which these activities shall be carried out. The permit system is intended to safeguard heritage resources by requiring that those who use or investigate them:

- have a legitimate reason for doing so,
- are competent in the activity they plan to undertake,
- employ methods which ensure maximum data recovery,
- report the results of their undertaking to the province in a satisfactory manner and within a reasonable time, and
- have provided for the curation, in perpetuity, of all recovered objects and associated records.

The purpose of this document is to outline general permitting policies and procedures, as well as performance and reporting standards expected of permit holders. Conformity to these guidelines will ensure the conservation and preservation of Saskatchewan's heritage resources in an economical and planned fashion, and that reliable and standardized baseline data are available for future researchers, resource managers and the public.

Commonly, two circumstances arise for which an archaeological investigation permit is required:

a) to carry out academic **research**, or a restricted version thereof; and

b) to **assess or mitigate impacts** on heritage resources from proposed land development or other causes.

Two types of archaeological research are recognized: **Type A (Academic)** and **Type B (Restricted)**. Academic research refers to scientific investigations, including surveys, collections, and excavations, which are professionally conducted and reported, and result in substantive contributions to Saskatchewan archaeology. Restricted research is generally limited avocational archaeological site survey and surface artifact collection with less stringent reporting requirements.

Heritage resource impact assessment/mitigation (hria/m) studies are conducted pursuant to Section 63 of the HPA. Section 63 empowers the Minister to require any person, whose land

development or other action may adversely affect heritage resources, to carry out hria/m investigations, or any other conservation or protection measures deemed appropriate.

General archaeological permitting procedures and requirements are presented in the following section. Specific research and hria/m permit reporting requirements are subsequently outlined.

PERMIT REQUIREMENTS - GENERAL

Minimum Qualifications of Permit Applicant

Permit applicants wishing to undertake hria/m or Type A archaeological research studies must have a Master's degree in archaeology, anthropology, or a closely related field. The Master's degree must have involved the preparation of a written thesis on an archaeological research or resource management topic. Normally, the thesis topic will relate to the type of investigation proposed.

Applicants who do not have a thesis Masters degree may apply to the Heritage Branch for interim permit status provided they have a Bachelor's degree in archaeology or anthropology. A letter of application for interim status should be accompanied by: 1) a curriculum vitae; 2) a substantial example of written work dealing with a topic relevant to the archaeological activity proposed; and 3) other, relevant supporting documentation, including letters of reference from the Saskatchewan Association of Professional Archaeologists (or a comparable group) and one or more senior professional archaeologists (preferably affiliated with an academic or research institution). Applicants must also have a sponsor who meets the minimum permit requirements. The sponsor shall co-sign the application, and agree in writing to review and endorse the study methods proposed and satisfactorily complete the project and submit a report if, for any reason, the applicant is unable to do so.

Normally, permit applicants will be expected to: 1) demonstrate the ability to complete research in a timely fashion, and 2) have a minimum of 1.5 years of professional experience or training in field, laboratory, and documentary research including at least six months field work experience in the type of archaeological activity proposed.

Applicants must also have practical archaeological experience in the general region in which they propose to work (e.g. the northern plains, parkland/boreal forest, or sub-arctic).

Those wishing to apply for a Type B (Restricted) research permit need not meet the professional qualifications described above. Type B permit applications will be assessed on a case-by-case basis, determined in part by the applicant's experience, past performance and scope of work proposed. (For further information on Type B permits see *Avocational Archaeological Permit Guidelines* and the *Avocational Archaeology Field Manual*, both produced by the Heritage Branch.)

Permit Application Forms

The same application form is used for both archaeological research and hria/m studies. In either case, a detailed project description (including exact location), a discussion of the project's specific objectives and (local, regional or provincial) significance, and a detailed outline of the proposed

study design and methodology must accompany the application form. A permit application must be completed to the satisfaction of the Minister or his designate before a permit will be issued. Permit application forms are available from the Heritage Branch.

Artifact/Record Curation and Disposition

It is the responsibility of the permit applicant to arrange for the permanent deposition, within the Province of Saskatchewan, of all recovered archaeological objects and associated records (i.e. photographs, field recording forms, maps, etc.). The receiving institution must be identified on the permit application form. The applicant may also be required to supply the Minister or his designate with a written endorsement from the repository concerning the curation of recovered objects and records. The agency or institution assuming long-term curatorial responsibilities will be required to meet certain standards established by the Heritage Branch.

If, for the purposes of display or study, archaeological objects, records or related data must be transported and temprarily housed outside the Province of Saskatchewan, the name and location of the facility must be specified on the application. Other particulars, including curatorial standards, security measures, and the date the objects are to be returned to Saskatchewan must also be indicated.

Permit Application Review

Permit applications are submitted to and processed by the Archaeological Resource Managment (ARM) program of the Heritage Branch. Applications are reviewed vis-a-vis the qualifications of the applicant, the scope and objectives of the proposed project, the suitability of the field and laboratory methods, and other factors. The applicant may be asked to provide additional information or clarification before a recommendation is forwarded to the Minister or his designate.

Permit Issuance

Under normal operating circumstances a one to three week turn-a-round should be expected between submission of permit application and the issuance of an **Archaeological Resources Investigation Permit**. In cases where this delay in permit issuance may jeopardize archaeological resource interests, a "verbal permit" may be issued by the Minister or his designate upon receipt of a written application. A "verbal permit" policy is provided in Appendix I.

An Archaeological Resources Investigation Permit may be issued subject to any further terms and conditions respecting supervision, scheduling, methodology, reporting, curation or other factors that the Minister or his designate prescribe.

Furthermore, the Minister or his designate may refuse to issue or renew a permit or suspend or revoke a permit at any time, subject to the provisions and in the manner prescribed in Section 68 and 69 of the HPA.

Once issued, permit responsibilities may not be transfered. Also, permits are valid only for the period specified or for the calender year in which the permit was issued. If the investigation must be carried over to the next calender year, both an interim report and a second permit application must be submitted.

General Conditions

A permit does not automatically entitle its holder to enter land for the purpose of conducting archaeological research or hria/m study. The permit holder is responsible for securing permission to enter land from the registered owner or occupier of the land. Where the property is vacant Crown-owned, the permit holder must obtain permission from the provincial department charged with administering the land.

Where a threat of disturbance to an archaeological site exists, the permit holder must report the site and source of disturbance to the Heritage Branch within 48 hours of the site's discovery.

All permit holders must follow the highest professional standards in the performance of archaeological field and laboratory work and preparation and maintenance of artifact catalogues and other records.

Any changes in the permitted activities (e.g. project scheduling, study areas, scope of work, field methods, etc.) must be conveyed in writing to the ARM Supervisor.

Supervisory Responsibilities

The permit holder is required to directly supervise at least 75% of all permitted field activity.

A student conducting an archaeological field research study as part of a post-graduate, university program, may apply for a Type A (Academic) research permit. A permit may be granted provided the student has a sponsor who meets the requirements respecting a Type A permit. The sponsor must co-sign the permit application and agree in writing to: 1) review and endorse the research methods and objectives proposed by the student, 2) inspect the student's field activities before they are one-third completed, and 3) submit a statement on the student's progress to the ARM Supervisor, within 20 days of the inspection, and 4) submit a satisfactory final report if, for any reason, the student is unable to complete the work.

Inspection of Permitted Activities

The Heritage Branch reserves the right to inspect the permitted field and laboratory work.

General Reporting Procedures and Requirements

Normally, a permit holder shall prepare and submit a draft, progress and/or interim report on the permitted activities to the ARM Supervisor for review by the end of the calendar year in which the permit was issued. The final report, addressing any deficiencies, is normally required on or before the date specified on the investigation permit.

Prior to the submission of the final report (and preferably prior to submitting draft reports), a Saskatchewan Archaeological Resource Record (SARR) or, in the case of historic structures, an Historic Conservation Site Inventory Record, must be completed and submitted for any new site discovered. As well, SARR Update forms must be submitted for previously recorded archaeological sites investigated under the terms of the permit.
All site inventory records should be submitted for processing and Borden number confirmation as soon after completion of the field work as possible. These assigned Borden numbers must be used when referring to archaeological sites in the final report.

Three bound copies of all final reports resulting from either research or hria/m studies must be submitted to the ARM Supervisor.

Permit Compliance and Non-Compliance

An Archaeological Resources Investigation Permit shall be retired, and the permit-holder's responsibilities concluded, upon submission and approval of a final report and deposition of all recovered archaeological objects and data records in the designated repository. A permit may also be retired upon receipt of the permit holder's written notification and explanation that the archaeological project was cancelled or not carried out.

Failure to comply with the procedures and requirements outlined in this document, or with the terms and conditions specified in an Archaeological Resources Investigation Permit, may result in permit suspension or cancellation. Permit holders who fail to fulfil permit conditions or obligations may also be denied future investigation permits. Serious instances of non-compliance may be considered offenses pursuant to Section 73 of the HPA.

REPORTING REQUIREMENTS

Introduction

Permits for archaeological research have different reporting requirements than those for hria/m studies. Archaeological research is generally conducted under more relaxed time and reporting conditions than hria/m studies. Consequently, greater time for research design, project execution, analysis and documentation is available. Moreover, the scope of research projects does not generally entail wholesale disturbance or destruction of archaeological resources.

For hria/m studies, on the other hand, restrictive deadlines for project completion are usually imposed by development and environmental review schedules. The 'need-to-know' at specific intervals is much greater for hria/m investigations, particularly those tied directly to phases of development project planning (e.g. from preliminary design to project implementation). Consequently, hria/m reporting requirements and schedules are considerably more rigorous.

Basic reporting requirements and recommended formats for both archaeological research and hria/m report are outlined below. Although adherence to the reporting formats will ensure greater reporting consistency, and thereby facilitate report use by future researchers, they need not be used as a 'cook book' by permit holders. Archaeological reports must be tailored to meet the specific characteristics and needs of a project or development. However, permit reports must contain sufficient and appropriate information for resource management decision-making. (Report guidelines for hria/m studies are described in greater detail in [draft] **Guidelines Respecting the Conduct of Heritage Resources Impact Assessments or Mitigation Studies in the Province of Saskatchewan**.)

Basic Reporting Requirements

All (final) archaeological investigation reports must meet the following basic requirements:

- The report must be typewritten, organized in an acceptable manner, and be reasonably free of grammatical and typographical errors.
- The report must describe all field work conducted, noting in particular the location and extent of investigation at each site.
- The report must include accurate maps showing, minimally, all pedestrian survey and (on-site) test unit locations. Details concerning test unit dimensions, profile, contents, etc. must also be provided.
- Detailed planviews of each site must be provided, as well as vertical sectional illustrations

of each excavated site. Representative photographs of each site must also be furnished.

- The provenience, number and, where appropriate, weight of all archaeological objects observed or recovered must be reported.

- All diagnostic and formed archaeological objects must be adequately described, including relevant quantitative and qualitative attributes. Generally, all such objects must be photographed or be line-drawn. Original photographs or photo offsets of line drawings must accompany the report.

Archaeological Research Report Format

Two types of archaeological research are recognized: Type A (Academic) and Type B (Restricted). Type A research is scientific in nature and typically conducted by university, museum-based and independent professional researchers. Professionally supervised archaeological investigations such as site survey, systematic surface artifact collection, and formal excavation are included. Type B research, which is typically conducted by avocational archaeologists, is restricted in scope and usually limited to site survey and surface artifact collection. The specific reporting requirements for Type B research projects are described in the **Avocational Archaeology Field Manual**.

The minimum components of a final Type A research report shall be:

(a) Title Page - report title, permit number, author and date

(b) Abstract - a summary of pertinent objectives, methods, results and conclusions

(c) Table of Contents - including lists of tables, figures, etc.

(d) Introduction - who, what, when, where, why, and how concerning the study, including reasons for the study, the general location of the study area, the scope of field work and analysis, the deposition of records and recovered objects, acknowledgement of sponsor or funding agencies or enabling individuals, the general organization of the report.

(e) Research Goals and Strategy - a more specific statement of the overall objectives of the project, and the means used to attain these.

(f) Study Area Description - a description of the cultural historical setting (including ethnography and ethnohistory, where appropriate) of the study area or region, a description of the study area's biophysical environment including geology, geomorphology and topography, vegetation, fauna, and climate; a map of the study area from a regional perspective and a detailed map of the study area.

(g) Methods of Data Collection and Analysis - a detailed description, including any maps or illustrations, of the survey, surface collection, and/or excavation methods, as well
as the analytical methods used in the study.

(h) Results and Analysis - presentation and description of data, including classification system used; presentation of results of analyses of the data; illustrations, photographs, tables and figures.

(i) Comparative Synthesis - an integration or synthesis of analytical results with relevant environmental, paleo-environmental, historical and archaeological information (normally from other regional and area studies).

(j) Summary, Discussion and Conclusion - summarizes, discusses and evaluates the research reported.

(k) References Cited - in *American Antiquity* style.

(l) Appendices - any supporting records or other data.

Heritage Resources Impact Assessment/Mitigation Studies

Six distinct types of hria/m study are recognized. These may be undertaken to meet specific objectives at different stages in the development planning process. For example, **Overview**, **Reconnaissance**, **Inventory**, and **Assessment** are concerned with the prediction, location and documentation, and evaluation of archaeological resources and potential impacts during the initial design stages of development planning. **Mitigation** follows directly from inventory and assessment study and is concerned with managing unavoidable adverse impacts prior to or during project construction. Finally, **surveillance and monitoring** serves to document or mitigate unanticipated impacts on archaeological resources either during or following construction.

The scope and type of hria/m study may vary in response to the size and type of the development project. For large-scale and/or long-term developments, these different studies are usually approached sequentially, with each new study phase dependent on results and recommendations of the preceding study. For small-scale projects, however, these different study phases are frequently collapsed, reduced in scope, or deleted altogether.

Overview

An Overview is a preliminary statement of the archaeological resource potential of an area or region in which a development is proposed. The study may serve to evaluate development project feasibility, or assist in selecting a preferred project site or level of development among

possible alternatives. The Overview should also identify where conflicts between archaeological resources and development are likely to occur, and recommend where and perhaps how subsequent investigation should be undertaken.

Normally, the Overview is based entirely on existing cultural and biophysical information obtained from archival literature, published and unpublished records, maps and reports maintained by government agencies, universities, or other institutions, and/or through direct consultation with knowledgeable individuals or groups. Except where actual field work is conducted, an Archaeological Resources Investigation Permit is not required for an Overview study.

Reconnaissance

An archaeological Reconnaissance involves field inspection and documentary research to obtain a more precise understanding of the archaeological resources and environmental characteristics in the immediate study or development area. A Reconnaissance study usually serves to supplement the Overview study, especially where documentary sources needed for assessing resource potential are inadequate. The Reconnaissance is often undertaken as the first step in a more detailed (Inventory) study, and, as such, would not entail a complete and comprehensive survey of a development area.

Inventory Survey

Inventory Survey involves intensive field inspection to locate and record archaeological resources in a specified project area. The survey must be sufficiently thorough to a) identify where all or most archaeological sites are located, or, b) in the case of large survey areas, obtain a representative sample of sites to enable a reliable understanding of the project area's overall resource density, distribution and variability. Where complete or 100 per cent coverage of an area is not feasible, systematic sampling techniques are usually employed. Survey methods typically involve surface inspection (e.g. linear transects or grids), as well as sub-surface testing by manual or mechanical means. Inventory Survey also includes complete documentation of each identified heritage site.

Site Assessment

Site Assessment is concerned with determining the relative value or significance of each archaeological resource located in unavoidable conflict with development activities. The results are used to determine what type and level of mitigative action, if any, will be needed. Several kinds of significance (e.g. scientific, humanistic, historical, interpretive, economic, etc.) need to be considered when evaluating archaeological resources. Criteria used to measure these heritage values, and the evaluation process or system itself, must be explicitly documented. Data on which to base a significance determination is most often obtained through systematic test excavation and surface artifact collection. Assessment also involves describing all development-related impacts on sites, establishing when they are expected to occur, and assessing their effect (in as objective and quantitative a manner as possible) on future use of the resource.

Mitigation

Mitigation studies involve the implementation of approved measures for reducing or otherwise managing adverse, development-related impacts on archaeological resources. Actions designed to avoid or prevent adverse impacts are also regarded as mitigation. In this regard, options available for mitigating impacts include: development project relocation or redesign (i.e. avoidance); site protection measures (e.g. physical barriers, stabilization, protective covering or "capping", etc.); and systematic archaeological data recovery (e.g. complete or partial salvage excavation).

Monitoring

Monitoring ensures that adverse, development-related impacts on archaeological resources which could not be reliably predicted or managed before construction are documented and mitigated, where possible. For example, either construction monitoring or post-impact monitoring (following construction) is often warranted where development actions may unexpectedly expose or disturb sites. Monitoring is often conducted: a) in areas suspected of containing deeply buried archaeological sites; b) where sites, although deliberately avoided, are situated very close to the area of impact; and c) where there is uncertainty concerning the effectiveness of a mitigation measure (e.g. fencing or "capping"). Monitoring often constitutes a "trade-off" between accepting adverse impacts to sites and documenting sites which might not otherwise be known. Follow-up mitigation may be required in some cases.

Heritage Resource Impact Assessment/Mitigation Report Format

The basic components of an hria/m report will vary depending on the type of study conducted. The following components generally apply to most hria/m studies. Exceptions are specifically noted.

(a) Title Page - report title, permit number, author, client and date

(b) Management Summary - a summary of pertinent study scope and objectives, methods, results, resource potential/significance, conclusions and recommendations.

(c) Table of Contents - a comprehensive listing of all headings in the report and their respective page numbers; lists of tables, figures, etc. are also given.

(d) Introduction - who, what, when, where, why, and how concerning the study, including type of study, reasons for the study, general location of the study area, study terms of reference, person-days expended, deposition of any records and recovered objects, acknowledgement of sponsor, funding agencies or enabling

individuals; the general organization of the report.

(e) Development Project Description - a brief description of the type and scope of land development under investigation, and the type of impacts which may be expected.

(f) Study Goals and Strategy - a more specific statement of the overall study objectives and the means used to attain them.

(g) Study Area Description - a synthesis of the cultural historical setting (including ethnography and ethnohistory, where appropriate) of the study area or region; a description of the area's biophysical environment (including geology, geomorphology and topography, vegetation, fauna, and climate); a regional and a detailed map of the study area.

(h) Previous Research - a summary or evaluation of previous archaeological (and other relevant) research in a region; predictive statements concerning site locations, settlement patterns, site density, site types, etc.; discussion of problems concerning the reliability of available data; not applicable to Monitoring study.

(i) Methods of Data Collection and Analysis - a detailed description, including any maps or illustrations, of the documentary, field, and/or analytical and laboratory methods used in the study.

(j) Results and Analysis - description of data collected (e.g. site inventory) including the classification system used; presentation and explanation of results of analyses of the data, supplemented with illustrations, photographs, tables and figures; not always applicable to Overview and Monitoring studies.

(k) Analysis Summary - an integration or synthesis of analytical results with relevant environmental, paleo-environmental, historical and archaeological information; generally not applicable to Overview and Monitoring studies.

(l) Comparative Synthesis - a comparison of the analysis summary with other regional and area studies.

(m) Summary, Discussion and Conclusion - summarizes, discusses and evaluates the research reported; highlights substantive contributions to archaeological understanding.

(n) Recommendations - recommends development approval/clearance and/or future hria/m study priorities and scheduling, development relocation or re-design options; compensation and resource development opportunities, research potential, etc;

(o) References Cited - in *American Antiquity* style.

(p) Appendices - any supporting records or other data.

Short Report

In the event a reconnaissance, inventory, or monitoring study produces no archaeological resources, an abbreviated or "short" report may be submitted. Such a report should contain:

- the name of the project or land development and identification of sponsoring agency; a description of the development's location, size, type and general environmental context; and a map of the study area clearly showing areas archaeologically surveyed;
- a description of the study scope and objectives, inspection procedures employed, and survey intensity; and a discussion of any constraints on survey coverage;
- a statement that no archaeological resources are present or were observed in the study area; and
- recommendations for further hria/m studies or other action, if warranted.

For further information on the archaeological resource investigation permit system in Saskatchewan, please contact:

Program Head/Sr. Archaeologist
Archaeological Resource Management
Community Support Services Branch - Heritage
Saskatchewan Municipal Affairs, Culture and Housing
#432 - 1855 Victoria Avenue
Regina, Saskatchewan
S4S 5W6

(306) 787-5772

APPENDIX 1

Verbal Permits Policy

Verbal Archaeological Investigation Permits

All persons applying for investigation permits, pursuant to Sec. 67 of *The Heritage Property Act*, are advised of the following provisions for "verbal" permits:

- Verbal authorization to commence field investigations pertains to impact assessment and mitigation studies only;

- Verbal authorization will be issued only after a signed and completed permit application (with detailed study plan) is received via FAX transmission (**306 787-0069**), courier, or other means. The Heritage Branch will contact the applicant, normally within one working day, to confirm authorization. A formal investigation permit, signed by the Minister or a designate, will follow.

- Applicants requiring verbal authorization on weekends, statutory holidays, or during non-office hours may call **(306 787-5772)**. Messages left here will be checked each day.

These procedures are needed to maintain the integrity of the investigation permit system in light of the increasing number of permit applications received each year. Applicants are reminded that verbal permits will be issued in response to emergency situations only (e.g. when heritage sites are in imminent danger of destruction from either cultural or natural forces, or to accommodate unalterable development program schedules). Verbal permits are not intended to streamline the normal permit application process.